

REESE LLP

VIA CM/ECF

March 23, 2023

The Honorable Ronnie Abrams
United States District Court
for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: Rivera et. al v. SC Johnson & Son, Inc.
Case No. 20-cv-03588-RA

REQUEST FOR A STAY

Dear Judge Abrams:

Along with co-counsel, my firm represent plaintiffs ("Plaintiffs") in the above-referenced matter. We submit this letter pursuant to section 1.D of Your Honor's Individual Rules and Practices.

Counsel for defendant SC Johnson & Son, Inc. ("Defendant") has reviewed this letter and agrees to its content and the relief it seeks. Plaintiffs and Defendants are referred to herein as "the Parties").

The Parties have engaged in discussions to potentially resolve this action and the related case captioned *McDougle, et al. v. S.C. Johnson & Son, Inc.*, Case No. 2:20-cv-00869-JPS (E.D. Wis.) since the hearing before Your Honor on March 10, 2023, and wish to focus their efforts on those discussions. The Parties also wish to preserve judicial resources. Accordingly, the Parties respectfully request that the above-captioned matter be stayed and that the Court reserve its ruling on Defendant's motion to dismiss until the Parties report back to the Court as to whether or not the matter has been resolved.

There have been no previous requests for a stay pending an attempt to resolve this action.

This action is hereby stayed *sine die*.
The parties shall update the Court on
the status of this matter no later than
April 21, 2023.

Respectfully submitted,



Michael R. Reese

SO ORDERED.



Hon. Ronnie Abrams
3/24/2023